

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
Chad Anthony Lucabaugh	:	
	:	Chapter 13
Debtor	:	
	:	Case No. 1:15-bk-04588
AJX Mortgage Trust I, A Delaware Trust,	:	
Wilmington Savings Fund Society, FSB, Trustee	:	
Movant	:	
v.	:	Answer to Motion for Relief
	:	from Stay
Chad Anthony Lucabaugh	:	
Jack N. Zaharopoulos, Chapter 13 Trustee	:	
Respondents	:	
	:	

RESPONDENT REPLY TO MOTION FOR
RELIEF FROM AUTOMATIC STAY OF SECURED CREDITOR

AND NOW, this 2nd day of August, 2021, come the respondent, Chad Anthony Lucabaugh, by and through counsel, the CGA Law Firm, Craig S. Sharnetzka, Esquire, and do file the within response averring that:

1. Admitted.
2. No answer is required. The document speaks for itself.
3. No answer is required. The document speaks for itself.
4. No answer is required. The document speaks for itself.
5. Denied. The Debtor admits that he is currently obligated and is aware of the original principal amount but is uncertain as to the exact amount of current indebtedness.
6. Denied. Denied as stated. The Debtor has made all post-petition payments to date, through July 30, 2021.
7. Denied. The Debtor believes he is current with mortgage payments.

8. Denied. For all of the reasons given above. AJX Mortgage Trust I, A Delaware Trust, Wilmington Savings Fund Society, FSB, Trustee has adequate protection, the Debtor has equity, this is his residence and is necessary for an effective reorganization.

WHEREFORE, it is requested that the relief sought not be granted.

Respectfully submitted,

CGA Law Firm, PC

/s/ Craig S. Sharnetzka
Craig S. Sharnetzka, Esquire
Sup. Ct. I.D. No. 83863
135 North George Street
York, PA 17401
(717) 848-4900
Counsel for Debtor

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	:	

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2021, service upon all interested parties indicated below was made by sending a true and correct copy of the Answer to Motion for Relief, by ECF and/or regular US Mail, postage prepaid, upon:

Jack N. Zaharopoulos , Chapter 13 Trustee
ECF

Harry B. Reese, Esquire
Eight Neshaminy Interplex, Suite 215
Trevose, PA 19053

/s/ Craig S. Sharnetzka
Craig S. Sharnetzka, Esquire